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8 **UNITED STATES DISTRICT COURT**  
 9 **EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION**

10  
 11 METROPOLITAN LIFE INSURANCE  
 COMPANY, a New York corporation,

12 Plaintiff,

13 vs.

14 ACDF, LLC, a California limited liability  
 company, et al.,

15 Defendants.

16 Lead Case No. 1:24-cv-01261-KES-SAB

17 Consolidated with Case Nos:  
 1:24-cv-01226; 1:24-cv-01230; 1:24-cv-  
 01231; 1:24-cv-01232; 1:24-cv-01233; 1:24-  
 cv-01235; and 1:24-cv-01241

**SUPPLEMENTAL DECLARATION OF  
 PHILLIP CHRISTENSEN IN SUPPORT  
 OF ORDER APPROVING SALE  
 PURSUANT TO NOTICE OF SALE [DOC.  
 NO. 159]**

Hearing:

Date: September 22, 2025

Time: 2:30 p.m.

Place: Robert E. Coyle U.S. Courthouse  
 2500 Tulare Street  
 Courtroom 6, 7th Floor  
 Fresno, CA 93721

- Affects All Cases
- Affects Metropolitan Life Ins. Co. v. ACDF, LLC, et al., 1:24-cv-01261
- Affects Metropolitan Life Ins. Co. v. FNF Farms, LLC, et al., 1:24-cv-01226
- Affects Metropolitan Life Ins. Co. v. C & A Farms, LLC, et al., 1:24-cv-01230
- Affects Metropolitan Life Ins. Co. v. Maricopa Orchards, LLC, et al., 1:24-cv-01231
- Affects Brighthouse Life Ins. Co. v. Kamm South, LLC, et al., 1:24-cv-01232
- Affects Brighthouse Life Ins. Co. v. Manning Avenue Pistachios, LLC, et al., 1:24-cv-01233 Case No. 1:24-cv-01233

- Affects Brighthouse Life Ins. Co. v. ACDF, LLC, et al., 1:24-cv-01235
- Affects MetLife Real Estate Lending, LLC v. Panoche Pistachios, LLC, et al., 1:24-cv-01241

I, Phillip Christensen, declare as follows:

1. I am the Receiver in the above-entitled action. I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would competently testify to such facts under oath.

2. I submit this supplemental declaration in support of my *Amended Notice of Sale Hearing and Auction* (ECF No. 159) (the “Sale Notice”), filed on August 18, 2025, pursuant to the approved sale procedures pursuant to the Sale Procedures Order (ECF No. 147) authorizing the Sale Notice.<sup>1</sup>

3. I hereby confirm, based on my business judgment and experience, that the sale proposed by the Sale Notice is in the best interest of this estate, that the price achieved represents the fair market value of the Subject Property, and that a commercially reasonable sale and marketing process was conducted.

4. Accordingly, I believe that the sale complies with the requirements of the Sale Procedures Order and the statutory requirements of 28 U.S.C. §§ 2001 and 2002, requiring a public marketing process, including publication of the sale once a week for at least four weeks prior to the sale.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 22nd day of September, 2025, at Fresno, California.

Y C Y

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Phillip Christensen

<sup>1</sup> Unless otherwise indicated, defined terms are the same as in the Sale Notice.

## **PROOF OF SERVICE OF DOCUMENT**

I am over the age of 18 and not a party to this case. My business address is: **Saul Ewing  
1888 Century Park East, Suite 1500, Los Angeles, CA 90067.**

A true and correct copy of the document entitled: **Supplemental Declaration of Phillip Christensen in Support of Order Approving Sale Pursuant to Notice of Sale [Doc. No. 159]** will be served or was served on the judge in chambers in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING**

**(NEF):** The foregoing document will be served by the court via NEF and hyperlink to the document. On **September 22, 2025**, I checked the CM/ECF docket for this case and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On September 22, 2025, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

**SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE**

**TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 on September 22, 2025, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

September 22, 2025      Hannah Richmond  
Date                  Printed Name

/s/ Hannah Richmond  
Signature

1     **1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING  
(NEF):**

- 2       • **Robert Cullen Barton**  
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- 37       • **Beth Ann R. Young**  
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21     **2. SERVED BY UNITED STATES MAIL (continued):**

22     John A. Bezmalinovic, General Counsel  
23     Katrina Ingrao  
24     The Assemi Group  
25     5260 N. Palm Ave., Suite 421  
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Fay Pugh  
Law Offices of Saul Reiss, P.C.  
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27     Ashlan & Hayes Investments, LLC  
28     c/o Agent for Service of Process  
29     John A. Bezmalinovic, General Counsel  
30     The Assemi Group

Grantor Fresno Clovis Investments, LLC  
c/o Agent for Service of Process  
John A. Bezmalinovic, General Counsel  
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6 **3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FAXSIMILE**  
7 **TRANSMISSION OR EMAIL (continued) :**

8 **VIA EMAIL:**

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